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 11 *Attorneys for Defendant*
 12 WESTERN STATES CONTRACTING, INC.

13
 14 **UNITED STATES DISTRICT COURT**
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16 **DISTRICT OF NEVADA**
 17

18 JAY COLLINS,) Case No.: 2:20-cv-00302-JAD-NJK
 19 Plaintiff,)
 20 vs.) **STIPULATION AND ORDER TO
 21 WESTERN STATES CONTRACTING,) EXTEND DISPOSITIVE MOTION
 22 INC, a Nevada corporation; AND DOES) DEADLINES
 23 1-50, inclusive,)
 24 Defendants.) **(SECOND REQUEST)**
 25**

26 IT IS HEREBY STIPULATED and agreed between Plaintiff JAY COLLINS
 27 (“Plaintiff”), through his counsel, Watkins & Letofsky, LLP, and Defendant
 28 WESTERN STATES CONTRACTING, (“Defendant” or “Western”), through its
 1 counsel, Fisher & Phillips LLP, as follows:

2 1. On June 9, 2020, the Court entered Scheduling Order granting Discovery
 3 Plan submitted by the parties. ECF No. 16.

4 2. The current deadline to file dispositive motions (November 1, 2021), be
 5 extended thirty (30) days to December 1, 2021. The extension is necessary because
 6 Defendant’s counsel has been handling an unexpected emergency involving a pro bono

1 client in foster care who requires special placement and medical treatment necessitating
2 court action and also because counsel has recently acquired multiple other cases
3 resulting from the resignation of a colleague.

4 3. This stipulation and order is sought in good faith and not for the purpose
5 of delay.

6 Dated this 28th day of October, 2021.

7 | WATKINS & LETOFSKY, LLP

FISCHER PHILLIPS LLP

/s/ Lisa A. McClane

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Attorneys for Defendant
WESTERN STATES CONTRACTING,
INC.

ORDER

IT IS SO ORDERED.

United States ~~District~~ Court / Magistrate Judge
Dated: October 28, 2021